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Attorney for Respondents

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 JEFFREY B. GUINN,

12 Appellant.

13 CDR INVESTMENTS, LLC, a Nevada
14 limited liability company; DONNA A.
15 RUTHE, as trustee for the CHARLES L.
16 RUTHE TRUST and on behalf of his
17 Individual Retirement Account; DONNA
A. RUTHE, in her representative capacity
18 as trustee for the FRANK E. GRANIERI
REVOCABLE LIVING TRUST,
19
20 Respondents,

Case No. BK-S-13-18986-BTB
CHAPTER 7

Adversary No. BK-S-14-01007-BTB

Case No. 2:19-cv-00649-JAD

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**STIPULATION TO EXTEND BRIEFING
SCHEDULE FOR APPEAL DUE TO
COVID-19 PANDEMIC**

(Third Request)

22 **ORDER**

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28 Respondents CDR INVESTMENTS, LLC, a Nevada limited liability company; DONNA
A. RUTHE, as trustee for the CHARLES L. RUTHE TRUST and on behalf of his Individual
Retirement Account; DONNA A. RUTHE, in her representative capacity as trustee for the
FRANK E. GRANIERI REVOCABLE LIVING TRUST (collectively, the “Respondents”), by
and through their attorneys of record, the law offices of Sylvester & Polednak, Ltd., and

1 Appellant JEFFREY B. GUINN (“Appellant”), by and through his attorneys of record Bailey
2 Kennedy, hereby STIPULATE AND AGREE to continue the Answering Brief and Reply Brief
3 deadlines in the appeal thirty (30) days, as follows:

- 4 1. A National Emergency related to the impact of the COVID-19 global
5 pandemic has been declared along with emergency declarations by several
6 states across the United States, including Nevada.
- 7 2. The Parties, their counsel, and all related individuals are focused, first and
8 foremost, on health and safety matters during this global pandemic and each
9 Party has issues with limited staffing and resources, limited access to files
10 and other resources, and other hurdles related to social distancing and
11 business and school closures.
- 12 3. Most, if not all, state courts and all federal courts in Nevada have recognized
13 the need for stays/postponements of litigation matters and cases.
- 14 4. Undersigned counsel, who is primarily responsible for the Answering Brief,
15 was working remotely to achieve social distancing objectives until very
16 recently on April 29. While he was able to complete certain tasks, he could
17 not work nearly as efficiently as he was able to do from his office.
18 Furthermore, during his time working remotely, undersigned counsel was
19 limited in his ability to confer with other attorneys responsible for this
20 matter.
- 21 5. Moreover, the Memorandum Decision that is the subject of this appeal is
22 quite lengthy (115 pages). The underlying adversary proceeding trial was
23 three weeks long. And as shown by the Designation of Record and

1 Statement on Appeal [Dkt. # 463], there are numerous relevant exhibits.
2 Thus, this appeal is more complicated than a typical adversary proceeding
3 appeal.

- 4
- 5 6. Due to the above, the Parties respectfully request an extension to the current
6 briefing schedule, moving all dates back thirty (30) days, as follows:
7
- 7 - Answering Brief deadline extended to July 8, 2020; and
8
- 8 - Reply Brief deadline extended to August 7, 2020.

9 IT IS SO STIPULATED.

10 DATED this 20th day of May, 2020.

DATED this 20th day of May, 2020.

11 SYLVESTER & POLEDNAK, LTD.

BAILEY KENNEDY

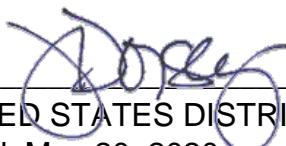
13 By /s/ Matthew T. Kneeland

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18 Attorneys for Respondents

By /s/ Joseph Liebman

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Attorneys for Appellant

19 IT IS SO ORDERED.

21 
22 UNITED STATES DISTRICT JUDGE
23 Dated: May 20, 2020.